

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

IN RE:	)	CHAPTER 13
	)	
<b>Felicia Monique Lucas,</b>	)	CASE NO.: <b>15-71222-JRS</b>
	)	
Debtor.	)	

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**MOTION TO SHORTEN NOTICE TIME ON  
MOTION TO INCUR NEW DEBT BY OBTAINING MORTGAGE TO PURCHASE  
REAL PROPERTY AND OBTAINING CREDIT CARD**

COMES NOW Debtor, by and through under-signed counsel, and herein do move pursuant to Local Court Rule 7007-1, for an expedited hearing on the Motion to Incur New Debt by Obtaining Mortgage to Purchase Real Property and Obtaining Credit Card Chapter 13 Case filed April 28, 2017 and in support thereof shows this Honorable court the following:

1.

Debtor filed a petition for relief pursuant to Chapter 13 Title 11 U.S.C. on November 2, 2015.

2.

Debtor requires a shortened notice date on her Motion to Incur New Debt by Obtaining Mortgage to Purchase Real Property and Obtaining Credit Card Chapter 13 Case as there is an anticipated closing date of May 22, 2017.

3.

Pursuant to Bankruptcy Rule 9006, and this Court's open calendar procedure, the earliest available hearing date is May 9, 2017 at 10:00AM. If the Motion is not granted, the Debtor may miss the opportunity to purchase real property.

WHEREFORE, based on the foregoing reason, Debtor prays that this request to shorten notice time on the motion be granted.

**[signature on following page]**

Dated: April 28, 2017

/s/

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Jonathan Proctor  
GA Bar No.: 890603  
The Semrad Law Firm, LLC  
Sterling Point II  
303 Perimeter Center North, Ste. 201  
Atlanta, Georgia 30346  
(678) 668-7160  
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**CERTIFICATE OF SERVICE**

I hereby certify that I am more than 18 years of age and that I have this day served a copy of the within Motion For Expedited Hearing upon the following by depositing a copy of the same via regular mail:

Felicia Monique Lucas  
871 Langston Trace  
Stone Mountain, Ga. 30083

*See attached for additional creditors served*

I further certify that, by agreement of parties, Mary Ida Townson, Standing Chapter 13 Trustee, was served via ECF.

Dated: April 28, 2017

\_\_\_\_\_  
/s/  
Jonathan Proctor  
GA Bar No.: 890603  
The Semrad Law Firm, LLC  
Sterling Point II  
303 Perimeter Center North, Ste. 201  
Atlanta, Georgia 30346  
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